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August 6, 2020

**BY ECF**

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

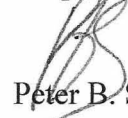
Re: *Bisnow LLC v. Thomas Lopez-Pierre*, Case No. 20-cv-03441-PAE-SLC

Dear Judge Engelmayer:

We represent Plaintiff Bisnow LLC ("Plaintiff") in the above-referenced case. We submit this letter pursuant to Rule 1(E) of Your Honor's Individual Practices in Civil Cases to respectfully request a brief extension of Plaintiff's time to respond to the Court's Order to Show Cause of July 30, 2020, as to why the case should not be dismissed for failure to prosecute. The Court's Order to Show Cause provides that Plaintiff may show cause by properly submitting a motion for default judgment. Toward that end, our firm submitted a request for a Clerk's Certificate of Default today. We anticipate issuance of a Certificate of Default in the near future, and we will be prepared to submit the actual motion for a default shortly after issuance of the Certificate of Default. However, our submission is currently due this Sunday, August 9, 2020, and members of our firm, who are largely working remotely during the pandemic, experienced significant disruptions this week with power outages and loss of internet service as a result of storm damage. Accordingly, we respectfully ask for an extension to submit a response to the Order to Show Cause to Friday, August 15, 2020.

This is the first request for an extension of this deadline. As Defendant has not appeared, I have not requested his consent. In addition to e-filing this request, we have sent a copy of this letter to Defendant by FedEx to ensure receipt.

Respectfully,

  
Peter B. Schalk

cc: Defendant Thomas Lopez-Pierre (via FedEx)